

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20544

August 15, 2002

In the matter of	)	
	)	
TELECOMMUNICATIONS RELAY SERVICE	)	CC DOCKET NO.98-67
AND SPEECH-TO-SPEECH SERVICES	)	
FOR INDIVIDUALS WITH	)	
HEARING AND SPEECH DISABILITIES	)	

**COMMENTS OF  
THE STATE OF MARYLAND  
DEPARTMENT OF BUDGET AND MANAGEMENT**

On July 29, 2002, the FCC issued a Public Notice relating to the Report and Order and Further Notice of Proposed Rule Making released in March 2000. This Public Notice titled, Pleading Cycle Established For Comment On Clarification Of Procedures For Emergency Calls At Telecommunications Relay Service (TRS) Centers address an issue that has been diligently pursued by the Department of Budget and Management (DBM)/ Telecommunications Access of Maryland (TAM), which oversees the Maryland Relay.

DBM/TAM supports the change of wording from *nearest* PSAP to *most appropriate* PSAP and encourages the FCC to clearly define the meaning of *most appropriate* PSAP as "the PSAP to which a direct call from an NPA-NXX-XXXX would be delivered." This routing will ensure that TRS customers benefit from the same complex, careful planning and routing established to save time and lives for users of the standard phone network.

The *nearest* PSAP is not always the *most appropriate* PSAP. In many areas, the nearest PSAP may be across a state, county, or other jurisdictional boundary.

These jurisdictions, which are close in physical proximity, may not have reciprocal agreements for emergency service in place like the ones that the emergency PSAP call routing scheme is based on. Bypassing the emergency PSAP routing scheme is inefficient and unsafe for consumers.

We further suggest that the FCC require that Relay providers have access to the database lookup established in each area that is used by the Local Phone systems for routing emergency calls, and requiring implementation and use of this standard system.

Currently, various TRS providers find PSAP numbers in different ways. Some areas call the local phone information for the local fire, police, or other emergency response unit, while others do paper copy lookups, or develop their own database. All of these methods waste time. DBM/TAM staff have followed up on a PSAP called from a specific NPA-NXX with two different vendors and have found that the amount of time wasted, and the number of calls to inappropriate PSAP is excessive.

Every second lost because emergency calls are not handled as efficiently on TRS as direct calls on the network could not only be inconvenient, it could be life or death for a TRS user.

Respectfully Submitted,

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